

Attachment 5 – NSW Government agency submissions and responses

Submission summary	Response summary	Recommended action
<p>Cancer Institute NSW</p> <p>Shade/UV radiation - Supportive of many priorities that include co-benefits of natural shade.</p> <p>Suggests that the provision of well-designed and located built and natural shade forms a consideration for principles and actions related to:</p> <ul style="list-style-type: none"> • Waterways and foreshore areas (P1). • Tree canopy (P5). • Green grid (P5). • Open space and recreation areas (P6). • Sportsgrounds (P6). • Sustainability and efficiency projects (P7). • Resilience (P8) – suggests a shade and UV protection strategy or policy (possibly with NSROC) – suggests new action. • Environment Strategy and climate action plan (P8). • Infrastructure and funding (P9, P11). • Healthy communities (P12) – suggests UV radiation and skin cancer incidence be included in wellbeing indicators (A12.7). • Neighbourhood and centre design, including public domain and local character (P17). • Public transport (P19). • Walking and cycling (P20). • Movement and place framework (P21). • Employment areas (P22). • Frenchs Forest (P23). • Manly (P26) – suggests amending principle for maximising sunshine on the beach to also acknowledge need for well-designed shaded areas to protect from UV radiation. • Studies and strategies (including Urban Tree Canopy Plan). • LEP and DCP controls. • Precinct planning and place plans. 	<p>The following amendments have been made to identify UV radiation as a natural hazard and the benefits of well-designed shade:</p> <ul style="list-style-type: none"> • Text was added to P5 that identifies UV radiation as a natural hazard, the high incidence of melanoma in the LGA and acknowledges that well-designed and correctly positioned shade from natural vegetation and built structures can reduce UV radiation. • P5, Figure 32* was amended to identify protection from UV radiation, comfort in hot weather and shelter as additional benefits of tree canopy and shade and passive building design as a measure. • An existing principle in P5 was amended to address the need to reduce UV radiation (in addition to UHI effect) by increasing tree canopy. • A5.2 was amended action to address tree canopy targets that respond to areas with high levels of UV radiation (in addition to UHI effect). Cancer Institute NSW was added as a partner for this action. • A5.3* was amended action to ensure design guidelines, LEP and DCP address UV radiation (in addition to tree canopy and UHI effect). It was noted that UV radiation may be addressed by well-designed built and natural shade. Cancer Institute NSW was added as a partner for this action (in addition to NSROC). • An existing principle in P8 was amended to mitigate UV radiation (in addition to UHI effect and extreme heat). • A8.6 identifies that Council will be preparing a climate action plan for the LGA. The action plan will address urban heat as well as UV radiation, for both health and urban cooling reasons. Cancer Institute NSW was added as a partner for this action. • A new principle was added to P9 to ensure infrastructure upgrades respond to the impacts of climate change, including urban heat and UV radiation. <p>Note: Council’s Environment and Climate Change Strategy <i>Protect. Create. Live.</i> was also amended to identify UV radiation as an urban hazard.</p>	<p>P5, Figure 32*, A5.2, A5.3*, P8, P9 amended</p>
<p>Green infrastructure/funding - Suggests that the provision of shade (both natural and built) is a type of green infrastructure that</p>	<p>P9 includes an action to work with the NSW Government to increase the range of essential infrastructure to be provided for under Section 7.11 of</p>	<p>A9.5* amended</p>

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<p>should be included in developer, contributions plans and in other fiscal policies of Council.</p>	<p>the EP&A Act (A9.5*). This action was amended to include green infrastructure.</p> <p>P9 also includes an action to work with the NSW Government to permit an increase to maximum permitted development contributions under Section 7.12 of the EP&A Act where required (A9.6*).</p>	
Cemeteries and Crematoria NSW		
<p>Cemeteries -</p> <ul style="list-style-type: none"> • The <i>Cemeteries and Crematoria Act 2013</i> which aims to ensure sufficient land availability. • The growing population will increase demand for burial and cremation services, with burial space in Sydney exhausted within 30 years and ‘at need’ burial space exhausted well before then. • The Northern Beaches has significantly high proportion of mature adults and retirees. • Identifies that existing cemeteries managed by Council are under pressure and have limited capacity. • Suggests that access to additional land for cemetery services will be needed to address projected needs. 	<p>Amendments were made to describe and address the need to plan for interment provision in response to the predicted shortfall of burial space and growing and ageing population in the LGA:</p> <ul style="list-style-type: none"> • New text was added to P12 outlining the need to plan for interment provision in the LGA. • A new principle was added to P12 to support the provision of interment services. • A new action (A12.10*) was added to investigate mechanisms to address the shortfall in cemeteries, earmark land for more cemetery space and investigate options for Council to acquire land to expand existing interment services. Cemeteries and Crematoria NSW were added as a partner for this action. <p>A definition for interment was added to the Glossary.</p>	<p>P12, Glossary amended</p> <p>A12.10* added</p>
City of Ryde		
<p>Transport - Supportive of inclusion of Ryde as a collaboration partner for public transport and infrastructure (Mona Vale – Macquarie Park bus connection). This same project is included in Ryde’s draft LSPS as a mass transit connection for investigation in 10-20 years.</p>	<p>Noted.</p>	<p>No change</p>
Create NSW		
<p>Shared use - Suggests shared and joint use of government-owned property, including schools and sports fields, and reference to privately owned property for arts and cultural activity.</p> <p>Notes that this could assist in addressing the Sydney-wide deficit of arts making spaces.</p>	<p>The shared use of government-owned places for arts and creative uses is identified in P14. Shared use is also addressed in P9 and P11, with specific reference to schools and sports fields.</p> <p>The following changes have been made to clarify that shared and joint use opportunities include both private and government owned facilities, and opportunities for arts and cultural activities:</p>	<p>P9, Map 12*, P11, P14, A14.3 amended</p>

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	<ul style="list-style-type: none"> • P9, Map 12* was amended to reference shared use of private facilities (in addition to government-owned facilities). • An infrastructure and collaboration principle in P9 was amended to reference shared use of private and public facilities (expanding on reference to public-private partnerships). • Community facilities text in P11 was amended to reference shared use of private and public facilities for arts and cultural activities and community uses (replacing the specific reference to school sports fields for community uses). • A community facilities principle in P11 was amended to identify arts and cultural activity and education as shared use opportunities (in addition to shared use for community uses). • An arts and creativity principle in P14 was amended to reference shared use of private facilities (in addition to government-owned facilities). • A14.3 was amended to reference shared use of private facilities (in addition to government-owned facilities). 	
<p>Libraries - Suggests referral of <i>Towards 2040</i> to State Library as there may be opportunity to partner to improve public library services.</p>	<p><i>Towards 2040</i> was referred to State Library for comment on 17 October 2019.</p>	<p>No change</p>
<p>Public art - Suggests incorporating public art projects into transport upgrades as public art has a positive effect on a community's willingness to wait and pay for transport.</p>	<p>Public art was incorporated into the B-Line and the coast walk.</p> <p>A new principle was added to P9 to incorporate public art projects into infrastructure upgrades.</p>	<p>P9 amended</p>
<p>Culture/arts and creativity/tourism/night time economy - Supports commitment to local Indigenous culture, arts and culture, tourism and night-time economy.</p> <p>Notes that the inclusion of cultural objectives in the LSPS is a first step towards integrating cultural activity and infrastructure into local planning.</p> <p>Suggests inclusion of the following elements:</p> <ul style="list-style-type: none"> • Relationship with local Aboriginal community. • Existing cultural infrastructure (the <i>NSW Cultural Infrastructure Plan 2025+</i>). • Cultural diversity within the Northern Beaches. 	<p>Opportunities to strengthen our relationship with the local Aboriginal community are outlined in P13, and a new principle was added to P14 to support Aboriginal-led arts and creative initiatives in significant locations. This action aligns with Council's Arts and Creativity Strategy.</p> <p>Council's Arts and Creativity Strategy includes initiatives to enable opportunities for our diverse community to participate in cultural life. A principle in P14 was amended to consider inclusive places.</p> <p>Public art is addressed in A14.2 and A14.5 which include new planning controls to facilitate public art in public and private developments and implementation of Council's Coast Walk Public Art Strategic Plan.</p> <p>The night-time economy is addressed in P30 which identifies the need to develop planning controls for night time economy, including a review of</p>	<p>P14, A14.8, Map 15* amended</p>

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<ul style="list-style-type: none"> The benefits of art and culture to a successful night-time economy. The existence or potential of cultural industries in your area. Existing and future public art projects. Joint-use opportunities. Tourism opportunities. The impact of arts and culture to successful place making. <p>Notes the benefit of arts and culture for the health and wellbeing of residents, with consideration to access by people with disabilities, seniors and children and young people.</p>	<p>barriers to night-time temporary uses, arts, cultural and creative uses.</p> <p>Tourism opportunities are addressed in P29 which identifies 'arts and creativity' and 'urban coast culture' as key tourism experience themes. A29.5 also identifies implementation of Council's Arts and Creative Strategy to support the tourism economy.</p> <p>Consideration of arts and creativity in place making is identified in A14.8. This action was expanded to ensure it is also a consideration in the public domain guidelines, destination management plan and night time economy strategy.</p> <p>P14 was amended to clarify the importance of arts and culture to tourism, night time economy and place making as follows:</p> <ul style="list-style-type: none"> The principle to enhance and promote creative expression was amended to include reference to design excellence and artistic expression and creativity in the public domain to strengthen connection to place. The principle to enable arts and cultural activity was amended to include evening activities. A14.8 was amended to include a reference to the night-time economy strategy. <p>Council's Arts and Creative Strategy identifies the existence of cultural industries in the area and includes a number of initiatives to enable the creative sector, including cultural mapping and needs analysis, supporting emerging arts hubs and supporting collaboration. The strategy will be implemented under A14.1. P14, Map 15* was amended and replaced with a more detailed map from Council's Arts and Creative Strategy.</p>	
Department of Planning, Industry and Environment – Development and Transactions (DPIE)		
<p>Former Manly Hospital site - Supportive in-principle of <i>Towards 2040</i> and notes that the former Manly Hospital site will provide important community infrastructure, providing new health facilities, an enhanced and activated public realm and preserved ecological communities. Notes collaborative work underway for development of a masterplan.</p>	<p>P9, Map 12* identifies the former Manly Hospital site as a collaboration project, with DPIE as partner.</p> <p>A new action (A26.4*) was added to acknowledge the collaborative work underway by Council and DPIE, to plan for future uses at the former Manly Hospital site.</p>	<p>A26.4* added</p>

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Water quality - Notes key landscape outcome for the former Manly Hospital site master plan is to have no net negative impact on the quality of water that is discharged into Sydney Harbour.	This is addressed in P1.	No change
Biodiversity - Notes key landscape outcome for the former Manly Hospital site master plan is to protect biodiversity and provide for wildlife corridors.	This is addressed in P2.	No change
Views - Notes key landscape outcome for the former Manly Hospital site master plan is to protect views to and from the site.	The protection of important views will be addressed in P3, which contains actions to prepare an LGA-wide scenic and cultural landscape assessment (A3.1) and to develop planning controls that protect views and scenic and cultural landscapes (A3.2). P3, Map 4 was amended to show the view corridor at the former Manly Hospital site.	Map 4 amended
Tree canopy - Notes key landscape outcome for the former Manly Hospital site master plan is to retain and revitalise existing landscape through enhanced urban tree canopy.	This is addressed in P5.	No change
Open space - Notes key landscape outcome for the former Manly Hospital site master plan is to connect the green and blue grid via public open space and/or publicly accessible open spaces and link to recreational trails in Sydney Harbour National Park.	Opportunities to improve links between the blue and green grid across the LGA will be investigated in an open space and recreation strategy (A1.4). A1.4 was amended to refer to the coast, in addition to waterways. The Coastal Walk from Barrenjoey Head to Manly has been identified as a Greater Green Grid Project and Council will review access to the foreshore and explore potential links to surrounding suburbs.	A1.4 amended
Efficiency - Notes the former Manly Hospital site master plan will explore precinct-scale sustainability mechanisms including on-site energy generation, distribution and storage and water reuse.	P7 identifies 'precinct-scale efficiencies' as an opportunity to encourage efficiency, and includes specific reference to renewable energy. A7.2 was amended to identify opportunities for renewable energy projects in the environment study, employment study and local housing strategy. The timeframe for the action has also been amended from immediate to ongoing.	A7.2 amended
Bush fire - Notes the former Manly Hospital site master plan will aim to mitigate bush fire risk (with regard to environmental impacts).	This is addressed in P8.	No change
Education - Notes the former Manly Hospital site master plan will consider potential education opportunities such as:	This is addressed in P10 which includes a principle to increase the availability of local education opportunities and A10.3 which refers to new	P10 amended

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<ul style="list-style-type: none"> • Lifelong learning and retraining. • Flexible teaching and learning facilities. • Shared supporting infrastructure/open leaning environment. • Public/private partnerships. 	<p>models of communal learning spaces.</p> <p>The text in P10 was amended to clarify that future opportunities for new models for learning include consideration of satellite campuses, shared communal learning spaces, flexible teaching facilities and partnerships.</p>	
<p>Community facilities - Notes the former Manly Hospital site master plan will consider potential for community facilities in addition to the adolescent and young adult hospice.</p>	<p>This is addressed in P11.</p>	<p>No change</p>
<p>Public access - Notes the former Manly Hospital site master plan will aim to maintain the feeling of a public asset that is open and connected for all to use.</p>	<p>Noted.</p>	<p>No change</p>
<p>Aboriginal heritage - Notes the former Manly Hospital site master plan will consider broader network of surrounding Aboriginal items and stories.</p>	<p>This is addressed in P13.</p>	<p>No change</p>
<p>Arts and creative - Notes the former Manly Hospital site master plan will consider potential for artistic, creative and innovative uses and temporary uses for markets, galleries and exhibition spaces.</p>	<p>This is addressed in P14.</p>	<p>No change</p>
<p>Public domain - Notes the former Manly Hospital site master plan will include a high quality public domain and neighbourhood scale community uses and facilities.</p>	<p>This will be addressed through a place-based approach to the preparation of a masterplan for the site and any associated supporting studies. A new action was added to support this (A26.4*).</p>	<p>A26.4* added</p>
<p>Heritage - Notes the former Manly Hospital site contains a number of significant heritage elements and buildings.</p>	<p>This is addressed in P18.</p>	<p>No change</p>
<p>Transport - Notes that future uses at the former Manly Hospital site may generate more demand for more frequent public transport to the site, its surrounds and North Head and support improved amenity and safety for pedestrians and cyclists.</p>	<p>This is addressed in P26 which includes a principle to improve links to future uses at North Head and the former Manly Hospital site.</p>	<p>No change</p>
<p>Tourism - Notes the former Manly Hospital site master plan will support creative, artistic and cultural uses and help drive tourism.</p>	<p>This is addressed in P29.</p>	<p>No change</p>
<p>Department of Primary Industries – Fisheries (DPI Fisheries)</p>		
<p>Sea walls - Suggests amendment to A1.3 - Develop LEP and DCP controls that incorporate...criteria for environmentally friendly sea walls – DPI Fisheries would like to be consulted.</p>	<p>DPI Fisheries was added as a partner for A1.3.</p>	<p>A1.3 amended</p>

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<p>Waterways - Supports A1.4 – safe and environmentally access to waterways for recreational fishers.</p>	<p>Noted.</p>	<p>No change</p>
<p>Moorings - Not supportive of any new moorings in seagrass. Requests that existing moorings in seagrass be relocated outside of seagrass.</p>	<p>DPI Fisheries' position of not supporting any new moorings in seagrass is understood and agreed to by Council. The potential impacts of any new moorings on the environment (including seagrass beds) will be addressed at the approval stage for new mooring proposals.</p>	<p>No change</p>
<p>Aquatic reserves - Supports recognition of the five existing aquatic reserves in the region.</p>	<p>Noted.</p>	<p>No change</p>
<p>Aquatic reserves - Notes that A1.9d aims to investigate the feasibility of new aquatic reserves for areas of high biodiversity value. However, a range of work has already been done to assess the region and establish the existing five aquatic reserves.</p> <p>Recommends that Council consider whether better management of the existing aquatic reserves and marine estate is a more suitable focus (e.g. work to better understand community values, threats to those values, objectives and associated management of the reserves).</p> <p>Notes that actions in <i>Towards 2040</i> such as improved stormwater management could help in this regard, particularly if focused on aquatic reserves such as Cabbage Tree Bay and North Harbour.</p>	<p>A1.9d was expanded to identify better management of existing aquatic reserves and marine estates. DPI Fisheries was added as a partner for A1.9.</p>	<p>A1.9 amended</p>
<p>Aquatic reserves - Notes that DPI Fisheries is happy to continue to work with Council, other managers and the community in relation to aquatic reserves, and that the reserves are not tenure-based, so several agencies are involved in managing these reserves.</p>	<p>DPI Fisheries was added as a partner for A1.9.</p>	<p>A1.9 amended</p>
<p>Tourism - Suggests that areas such as Long Reef – Narrabeen could be a focus or secondary focus for a marine destination, as Manly already has high visitation.</p>	<p>Council will promote the increased visitation to other marine locations on the Northern Beaches when the necessary transport infrastructure and amenities are in place to support increased visitation without negative impacts to the environment.</p>	<p>No change</p>
<p>NSW Environmental Protection Authority (EPA)</p>		
<p>Air quality - Supports actions related to:</p> <ul style="list-style-type: none"> Reducing vehicle emissions. Increasing urban canopy. 	<p>P8 was amended to include a new principle to minimise water, air and noise pollution, soil and groundwater contamination and its discharge into the environment.</p>	<p>P8 amended A8.8*, A8.9* added</p>

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<ul style="list-style-type: none"> Increasing building energy efficiency. <p>Notes domestic wood heaters are the major source of human-made fine particle emissions in the LGA.</p> <p>Suggests Council consider planning controls that help deliver cleaner forms of heating.</p>	<p>P8 was amended to note Council’s existing project to implement the NSW Wood Smoke Reduction program.</p> <p>A new action (A8.8*) was added to develop new LEP and DCP controls to ensure best practice environmental management, including responding to air quality impacts of wood heaters. EPA has been added as a partner for this action.</p> <p>A new action (A8.9*) was added to address ongoing monitoring of air quality. EPA was added as a partner for this action.</p>	
<p>Wellbeing indicators - Supports actions to develop community wellbeing indicators, as air quality also delivers public health benefit.</p>	<p>Noted.</p>	<p>No change</p>
<p>Land use conflict/air and noise - Notes need for strategic land use planning to minimise health impacts from co-locating sensitive development with roads or other activities of high air or noise emissions.</p> <p>Notes opportunity to address these land-use conflicts through actions in the draft LSPS e.g. placemaking for centres and transport corridors, reviewing planning controls and Council policies, undertaking key studies and strategies.</p> <p>Suggests Council adopt principles and approaches in Development near rail corridors and busy roads – interim guideline, Child Care Planning Guideline and Parramatta Road Corridor Urban Transformation Planning and Design Guidelines – Implementation tool kit, when preparing future planning controls (A19.2).</p> <p>Notes that industrial land in the LGA identified by GSC Sustainability Profile Map 37, has moderate potential for land use conflict.</p>	<p>This is addressed in:</p> <ul style="list-style-type: none"> P8 which contains a principle to avoid intensification of development and incompatible land uses in areas exposed to natural and urban hazards P15 which contains housing principles to limit development where there are unacceptable hazards and risk, impact on tree canopy and to avoid residential development in industrial precincts and business parks. A19.2 to develop planning controls to create good internal amenity for developments along main roads and future transport corridors P21 which contains a principle to coordinate land use and transport to improve amenity and support the safe and efficient movement of people, goods and service P28 which contains a principle to support industrial and urban services by managing the interface with adjoining land uses and ensuring residential development does not sterilise industrial or urban services land. <p>A28.1 includes developing new LEP and DCP controls that address land use interfaces. It was amended to also ensure uses in employment lands or adjoining areas are compatible with existing uses.</p>	<p>A28.1 amended</p>
<p>Infrastructure - Supportive of A28.1 (strategic review of industrial and urban services land) and recommends that this work be extended to a review of the SP2 Infrastructure zone and actions to safeguard transport and infrastructure needs.</p>	<p>This is addressed in:</p> <ul style="list-style-type: none"> A9.2 to develop LEP and DCP controls that safeguard transport and infrastructure needs, including a review of the SP2 infrastructure zone 	<p>No change</p>

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<p>Hazards - Recommends that Council in this review, address Action 81 in the <i>District Plan</i> – ‘Avoid locating new urban development in areas exposed to natural and urban hazards and consider options to limit the intensification of development in existing urban areas most exposed to hazards’.</p>	<p>This is addressed in:</p> <ul style="list-style-type: none"> • P8 which contains a principle to avoid intensification of development and incompatible land uses in areas exposed to natural and urban hazards. 	<p>No change</p>
<p>Land use conflict/noise - Notes that noise is a key health and wellbeing consideration in planning for healthy places and the importance of addressing noise impacts at the strategic planning level (spatial separation of incompatible land-uses) and employing a hierarchical approach to noise control.</p> <p>Notes potential for land use conflicts when planning for centres and new mixed-use development. Suggests Council strengthen A15.2 to also review planning codes to assess if they are contemporary, prevent land use conflict and are able to meet the community expectation for new places.</p> <p>Notes potential for land use conflicts when new housing/sensitive land uses are proposed in the vicinity of major road infrastructure and where there is expected traffic growth. Suggests Council review planning controls in these areas early on.</p>	<p>This is addressed in:</p> <ul style="list-style-type: none"> • P8 which contains a principle to avoid intensification of development and incompatible land uses in areas exposed to natural and urban hazards • P15 which contains housing principles to limit development where there are unacceptable hazards and risk, impact on tree canopy and to avoid residential development in industrial precincts and business parks • A19.2 to develop planning controls to create good internal amenity for developments along main roads and future transport corridors • P21 which contains a principle to coordinate land use and transport to improve amenity and support the safe and efficient movement of people, goods and service • P21.2 to develop planning controls to address noise mitigation on freight corridors. <p>A15.2 was amended to ensure the new LEP and DCP controls for housing minimise land use conflict.</p>	<p>A15.2 amended</p>
<p>Marinas/noise - Suggests Council apply a hierarchical approach to address noise-related land use conflicts for any marina expansion (A1.8):</p> <ul style="list-style-type: none"> • Spatial separation of incompatible land-uses (zoning) • Minimise noise emissions at source (design) • Reduce noise impact at receivers (design) 	<p>As outlined in A1.8, the expansion of the W2 zone is subject to a strategic sites assessment and expansion of marina facilities will only be considered subject to assessment of all impacts consistent with the approach suggested.</p>	<p>No change</p>
<p>Waterways - Suggests that the following concept be applied to strengthen the first principle in P1:</p> <ul style="list-style-type: none"> • Promote development that maintains or restores the community’s uses and values of waterways. Where these values are being achieved in a waterway, they should be protected; and where they are not being achieved, all activities should work towards their achievement over time. 	<p>This was added as a new principle in P1.</p>	<p>P1 amended</p>

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<p>Waterways - Suggests use of new DPIE mapping of high ecological value waterways and water dependent ecosystems to identify and address priority areas.</p>	<p>The Northern Beaches 'Natural Blue Grid' identified in P1, Map 2 consists of the waterways and water-dependent ecosystems with high ecological value, as identified by the mapping undertaken by DPIE.</p> <p>P1, Map 2 articulates the vision for the LGA's coast and waterways and identifies areas for improvement through the risk-based framework pilot project.</p>	<p>No change</p>
<p>Stormwater management - Suggests that actions to review stormwater controls be strengthened by ensuring that they include water sensitive urban design, including opportunities to deliver greater permeability for areas in both public and private domains.</p>	<p>The text in P1 was amended to clarify that WSUD will include greater permeability for public and private domain.</p> <p>A1.3 was amended to ensure the new LEP and DCP controls will incorporate integrated water cycle management (including WSUD).</p>	<p>P1, A1.3 amended</p>
<p>Unsewered areas - Supportive of actions to investigate opportunities to connect unsewered areas of the LGA.</p>	<p>Noted.</p>	<p>No change</p>
<p>Wastewater/stormwater - Suggests Council discuss the role of treated wastewater and stormwater as part of an investigation into promoting integrated water cycle management.</p>	<p>A principle in P1 was amended to incorporate integrated water cycle management into the built form, which is explained in detail in P1, Figure 25, which illustrates improved wastewater treatment, greywater and recycled water are key elements of integrated water cycle management.</p> <p>A1.3 was amended to ensure the new LEP and DCP controls will incorporate integrated water cycle management.</p>	<p>P1, A1.3 amended</p>
<p>Green infrastructure/funding - Notes that the role of water in the delivery of green infrastructure, open space and tree canopy should be an important consideration by Council.</p> <p>Notes the need for funding sources other than development contributions and that any review of contribution or funding approaches should include stormwater infrastructure and associated water quality devices.</p>	<p>This is addressed in:</p> <ul style="list-style-type: none"> • P5 which includes a principle to increase the urban tree canopy and green cover by incorporating water sensitive urban design • A5.1 to implement the Urban Tree Canopy Plan (which will address other opportunities for funding) • A5.3* to prepare design guidelines to inform LEP and DCP controls which include requirements for water sensitive urban design. <p>P9 includes an action to work with the NSW Government to increase the range of essential infrastructure to be provided for under Section 7.11 of the EP&A Act (A9.5*). This action was amended to include green infrastructure.</p> <p>P9 also includes an action to work with the NSW Government to permit an</p>	<p>A9.5* amended</p>

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	increase to maximum permitted development contributions under Section 7.12 of the EP&A Act where required (A9.6*).	
<p>Integrated water cycle management - Suggests that Council consider the development of green plans that are underpinned by integrated water cycle management, especially for key centres and areas.</p>	<p>A new action (A1.11*) was added to work with Sydney Water on the development of the Eastern Sydney Regional Master Plan.</p>	<p>A1.11* added</p>
<p>Waste management - Notes that draft actions to support better waste management outcomes are limited or high-level.</p> <p>Recommends that Council:</p> <ul style="list-style-type: none"> • Include a specific action, relating to key waste streams or activities for the LGA, and with a consideration for waste prevention measures and waste-infrastructure planning to support service outcomes. • Consider opportunities for circular economy outcomes through shared or community space and place-based design e.g. food donation, organic waste management infrastructure (e.g. community composting), or reuse and repair centres. • Incorporate content from EPA guidance notes on Waste and Resource Recovery to strengthen waste-related actions and resource recovery outcomes. 	<p>P7 focuses on opportunities to improve efficiency, including waste. P7 includes principles and actions relating to waste efficiency:</p> <ul style="list-style-type: none"> • a principle to support smart technology and infrastructure (opportunities include waste efficiencies through initiatives such as smart bins) • A7.2 to identify opportunities for precinct-scale efficiencies, smart technology and infrastructure and better building standards • A7.4 to improve building standards. <p>Building on this, amendments have been made to support circular economy outcomes:</p> <ul style="list-style-type: none"> • P7 - text was added to identify opportunities to transition to a circular economy through waste efficiency. • P7 - text was added to reference Kimbriki Resource and Recovery Centre. • P7 – principle to reduce the volume of waste and waste transport requirements was amended to refer to maximising re-use and recycling to support a circular economy. • A7.2 - action amended to identify opportunities for circular economy outcomes in the environment study, employment study and local housing strategy. • P7, Figure 39* was amended to include ‘facilitate circular economy outcomes’ as an LGA-wide efficiency action. • A definition of circular economy was added to the Glossary. • P9 – principle to ensure that new and upgraded infrastructure is efficient and flexible to adapt to long-term needs was amended to ensure that infrastructure also contributes to the circular economy. <p>Amendments were made to protect waste infrastructure land:</p> <ul style="list-style-type: none"> • P9 was amended to include a new principle to protect waste infrastructure land. 	<p>P7, Figure 39*, A7.2, P9, A9.2, Map 25*, Glossary amended</p> <p>Figure 36* added</p>

Submission summary	Response summary	Recommended action
	<ul style="list-style-type: none"> A9.2 was amended to ensure LEP and DCP controls protect waste infrastructure land (in addition to transport and other infrastructure needs). TfNSW was added as a partner for this action. <p>P21, Map 25* was amended to show waste facilities in relation to the LGA and describe where the LGA's waste and recycling is transported and processed. This is supported by actions in P21 which relate to urban freight, which includes responding to increased waste collections.</p> <p>A new figure (Figure 36*) was added to P7 to include commitments from <i>Protect. Create. Live.</i> which include:</p> <ul style="list-style-type: none"> 85% diversion of waste from landfill (2040) reducing the rate of waste generation per person (2040) reducing single use plastics (2040). 	
<p>Contaminated land - Notes lack of discussion of the management of contaminated land, other than its recognition as an urban hazard.</p> <p>Suggests that there is the opportunity to review Council's current approaches to the management of contaminated land and to include an action to consider contaminated land in planning controls, especially when planning for sensitive land-uses.</p>	<p>A principle to minimise groundwater contamination and its discharge into the environment, and a principle to reduce adverse impacts from development in environmentally sensitive areas have been added to P8.</p> <p>Text was added to P8 to ensure it references both natural and urban hazards, describe urban hazards in the LGA (including water, air and noise pollution and soil and groundwater contamination) and describe Council's work to minimise the generation of air and noise pollution and soil and groundwater contamination and its discharge into the environment.</p> <p>New actions have been added to P8 to address contaminated land management in LEP and DCP controls (A8.8*) and to investigate the establishment of a baseline and ongoing monitoring for pollution sources (A8.9*). EPA was added as a partner for these actions.</p> <p>P8, Map 11* was amended to show wastewater in close proximity to waterways and employment lands in close proximity to main stormwater arteries.</p>	<p>P8, Map 11* amended</p> <p>A8.8*, A8.9* added</p>

Submission summary	Response summary	Recommended action
Greater Sydney Commission's Phase 3 Assurance (GSC/DPIE)		
GSC Preliminary review of draft LSPS (12 November 2019)		
<p>Biodiversity - <i>District Plan</i> Action 61 - Suggests Sydney Harbour REP – critical habitat area (penguins) be included in the LSPS.</p>	<p>P2, Map 3 was amended to include critical habitat areas identified in <i>SREP (Sydney Harbour Catchment) 2005</i> – Little Penguin Critical Habitat.</p>	<p>Map 3 amended</p>
<p>Metropolitan Rural Area - The proposed extension to <i>District Plan</i> MRA boundary to include Belrose North cannot be considered by the GSC until the next review of the <i>Region Plan</i>. Suggests noting 'we have large portions of Belrose North that have traits and characteristics that are the same as Deferred Lands Areas'. Also include an action for Council to work with the GSC and DPIE to expand the MRA to include this land.</p>	<p>P4 text was amended to identify that Parts of Oxford Falls (south), Cromer Heights (west) and Belrose North, are not currently identified as part of the MRA in the <i>Region Plan</i> but share many of its traits and characteristics. It identifies this land area as 'Future MRA investigation area', and notes that Council will work with the GSC to assess its suitability for inclusion in the MRA when the <i>Region Plan</i> is reviewed. It also notes that using the precautionary principle, Council will apply the principles and actions in this priority to these lands until that review is complete.</p> <p>A new action (A4.6*) was added to work with the GSC and DPIE to investigate potential for inclusion of Belrose (north), Oxford Falls (south) and Cromer Heights (west) in the MRA.</p> <p>Maps and figures throughout <i>Towards 2040</i> were amended to reflect the extent of the MRA as represented in the <i>Greater Sydney Region Plan</i> and to identify areas of Belrose (north), Oxford Falls (south) and Cromer Heights (west) as 'potential future MRA investigation area'.</p>	<p>Map2, Figure 26, P2, Map 3, Map 4, Map 5, Map 5, Figure 30*, Figure 31*, Map 8*, Map 11*, Map 12*, Map 13*, Map 14*, Map 16*, Map 17*, Map 18*, Map 32*, Map 33* amended</p> <p>A4.6* added</p>
<p>Tree canopy - <i>District Plan</i> Action 70 - Suggests quantifying the current tree canopy coverage for the LGA.</p>	<p>A new map (Map 6*) was added to P5, to show the existing urban tree canopy coverage (%) of each suburb in the LGA.</p> <p>New text was added to P5 to identify that tree canopy varies significantly across the LGA, with an overall coverage of 39% (<i>North District Plan</i>), and low levels of urban tree canopy coverage in areas such as Queenscliff.</p> <p>A new infographic (Figure 33*) was added to P5 showing the Government Architects NSW's proposed tree canopy benchmarks, which will be used to guide development until such time that LGA-specific tree canopy and green cover targets are developed in accordance with A5.2.</p>	<p>P5 amended</p> <p>Figure 33*, Map 6* added</p>
<p>Open space - <i>District Plan</i> Action 72 - Suggests describing the current quality of open space within the LGA, broadly describing areas of the LGA with poor access to open space based on the 400m and 200m benchmarks in the <i>District Plan</i>.</p>	<p>An assessment of open space quality in the LGA will be undertaken as part of the open space and recreation strategy (A6.1).</p> <p>Open space categories described in P6 have been amended to reflect</p>	<p>P6, Map 8*, Figure 34, amended</p> <p>Maps 9* and 10* added</p>

Submission summary	Response summary	Recommended action
	<p>preliminary work on the open space and recreation strategy. P6, Map 8* and Figure 34 have been amended to reflect these new categories.</p> <p>Open space access has been addressed through new maps (Maps 9* and 10*) in P6 that show existing residential lots that are not located within 400m of open space and existing high-density residential lots (more than 60 dwellings/ha) not located within 200m of open space. The maps are based on 400m and 200m buffers, as pedshed data was not available.</p> <p>New text has been added to P6 to identify that although the Northern Beaches has a high proportion of homes within a 400m walk to open space (78%), there are areas which may be considered to have poor access to open space including:</p> <ul style="list-style-type: none"> • urban residential areas outside the 400m buffer include areas of Avalon Beach, Newport, Warriewood, Wheeler Heights, Seaforth, Collaroy Plateau and Freshwater • urban high-density residential areas outside the 200m buffer include areas of Dee Why, Collaroy, Queenscliff, Manly Vale, Fairlight and Balgowlah. 	
<p>Waste management - District Plan Action 76 – Suggests identifying future waste management challenges and identifying potential options to reduce volumes of waste.</p>	<p>P7 focuses on opportunities to improve efficiency, including waste. P7 includes principles and actions relating to waste efficiency:</p> <ul style="list-style-type: none"> • a principle to support smart technology and infrastructure (opportunities include waste efficiencies through initiatives such as smart bins) • A7.2 to identify opportunities for precinct-scale efficiencies, smart technology and infrastructure and better building standards • A7.4 to improve building standards. <p>Building on this, amendments have been made to support circular economy outcomes:</p> <ul style="list-style-type: none"> • P7 - text was added to identify opportunities to transition to a circular economy through waste efficiency. • P7 - text was added to reference Kimbriki Resource and Recovery Centre. • P7 – principle to reduce the volume of waste and waste transport requirements was amended to refer to maximising re-use and recycling to support a circular economy. 	<p>P7, Figure 39*, A7.2, P9, A9.2, Map 25*, Glossary amended</p> <p>Figure 36* added</p>

Submission summary	Response summary	Recommended action
	<ul style="list-style-type: none"> • A7.2 – action was amended to identify opportunities for circular economy outcomes in the environment study, employment study and local housing strategy • P7, Figure 39* was amended to facilitate circular economy outcomes as an LGA-wide efficiency action. • A definition of circular economy was added to the Glossary. • P9 – principle to ensure that new and upgraded infrastructure is efficient and flexible to adapt to long-term needs was amended to ensure that infrastructure also contributes to the circular economy. <p>Amendments were made to protect waste infrastructure land:</p> <ul style="list-style-type: none"> • P9 was amended to include a new principle to protect waste infrastructure land. • A9.2 was amended to ensure LEP and DCP controls protect waste infrastructure land (in addition to transport and other infrastructure needs). TfNSW was added as a partner for this action. <p>P21, Map 25* was amended to show waste facilities in relation to the LGA and describe where the LGA’s waste and recycling is transported and processed. This is supported by actions in P21 which relate to urban freight, which includes responding to increased waste collections.</p> <p>A new figure (Figure 36*) was added to P7 to include commitments from <i>Protect. Create. Live.</i> which include:</p> <ul style="list-style-type: none"> • 85% diversion of waste from landfill (2040). • reducing the rate of waste generation per person (2040). • reducing single use plastics (2040). 	
<p>Hazards - <i>District Plan</i> Action 80 - Suggests consideration of the likely impact of hazards to communities and infrastructure. This could include describing air pollution, noise pollution and contaminated land.</p>	<p>P8 has been amended to strengthen the focus on the likely impacts of hazards to the community and infrastructure and to address urban hazards:</p> <ul style="list-style-type: none"> • P8 - priority heading was amended to ‘Adapted to the impacts of natural and urban hazards and climate change’. • P8 - text was added describing urban hazards in the LGA (including water, air and noise pollution and soil and groundwater contamination). • P8 - text was added referencing implementation of NSW Wood Smoke Reduction Program. 	<p>P8, Map 11* amended</p> <p>A8.8*, A8.9*, A8.10* added</p>

Submission summary	Response summary	Recommended action
	<ul style="list-style-type: none"> • P8 - new principle to manage risks associated with sea-level rise was added. • P8 - new principle to minimise water, air and noise pollution, soil and groundwater contamination and its discharge into the environment was added. • P8 - new principle to minimise adverse impacts from development in environmentally sensitive areas was added. • A8.8* - new action to develop LEP and DCP controls to ensure best practice management of pollution and contamination was added. EPA was added as a partner for this action. • A8.9* - new action to investigate the establishment of a baseline and ongoing monitoring for specific pollution sources was added. EPA was added as a partner for this action. • A8.10* - new action to investigate mechanisms to minimise the incidence of illegal dumping. EPA was added as a partner for this action. <p>A principle was added to P9 to ensure infrastructure upgrades address impacts from climate change, including exposure to UV radiation and urban heat, sea-level rise and increased incidence of bushfire, flooding and storm surges.</p> <p>P8, Map 11* was amended to show:</p> <ul style="list-style-type: none"> • more detailed flood prone mapping. • more detailed bushfire prone land mapping. • wastewater in close proximity to waterways. • employment lands in close proximity to main stormwater arteries. 	
<p>Transport - <i>District Plan</i> Action 1 - Ensure consistency of terminology with <i>Future Transport 2056</i> when referring to transport corridors (e.g. city serving/ centre serving) and clarify NSW Government initiatives from Council-led initiatives</p>	<p>P9, Map 12*, P19, Map 22* and text in P19 have been amended to better align with terminology in <i>Future Transport 2056</i>.</p> <p>A19.3, A19.4, A19.5, A19.6 A19.8 were amended to note whether transport projects were TfNSW <i>Future Transport 2056</i> initiatives or initiatives that Council will advocate for.</p>	<p>Map 12*, Map 22*, P19, A19.3, A19.4, A19.5, A19.6, A19.8 amended</p>
<p>Shared use - <i>District Plan</i> Action 5 - Opportunities for shared use for infrastructure to be mapped.</p>	<p>Shared use, joint use and partnerships relating to use of infrastructure are addressed in:</p> <ul style="list-style-type: none"> • principles in P6, P9, P11, P14 to encourage partnerships, shared use and joint use opportunities. 	<p>Map 8*, Map 12* amended</p>

Submission summary	Response summary	Recommended action
	<ul style="list-style-type: none"> A6.3, A10.2, A11.3, A11.5, A11.7 and A14.3 which facilitate shared use and list partners. <p>To further identify opportunities for shared use the following amendments have been made:</p> <ul style="list-style-type: none"> P6, Map 8* was amended to identify schools that may provide potential opportunities for shared use, particularly in response to locations that may have limited access to open space (refer to Maps 9* and 10* in P6). P9, Map 12* already identifies shared and joint use of government-owned property, including schools and sport fields, with DOE and independent schools listed as a partner. However, the map was amended to show Council's MOU with Narrabeen High. 	
<p>Housing - District Plan Action 17 – Misalignment between LSPS housing numbers to 2036 and the numbers released by the GSC, producing a discrepancy of 6,235. Concern that future housing supply does not contribute enough to the 92,000 North District implied dwelling target.</p>	<p>Council will work with DPIE to provide updated housing demand projections in the local housing strategy. P15 was updated to include new text that notes:</p> <ul style="list-style-type: none"> the discrepancy between DPIE and Council's estimated future dwelling demand figures due to different household size projections. further work to determine dwelling targets to be detailed in Council's local housing strategy. 	P15 amended
<p>Housing - District Plan Action 17 – Suggests the LSPS include take up rates, capacity projections and future opportunities for more housing.</p>	<p>P15 identifies that there is capacity for around 6,400 new dwellings to be developed in areas already zoned for growth and 4,360 dwellings in Frenchs Forest Planned Precinct. It is projected that there will be demand for 11,265 dwellings by 2036, resulting in a gap of 480 dwellings (P15, Figure 48*).</p> <p>The local housing strategy (A15.1) will include a more detailed analysis of housing capacity, including take up and future housing opportunities to inform changes to the LEP.</p>	No change
<p>Housing - District Plan Action 17 – Suggests the LSPS identify mechanisms to achieve housing diversity.</p>	<p>Housing diversity is identified as an important consideration and included as a principle to guide future decisions on housing (P15, Figure 51*). This will be addressed in the local housing strategy (A15.1).</p>	No change
<p>Housing - District Plan Action 17 – Suggests identifying future housing opportunities from Beaches Link Tunnel and other transport projects.</p>	<p>The structure plan identifies a 'Beaches Link Tunnel investigation area' and A19.7 indicates Council's commitment to investigate opportunities in areas subject to change from the tunnel project. Furthermore, the local housing strategy (A15.1) will explore future housing opportunities, including if any opportunities exist from the Beaches Link Tunnel and</p>	No change

Submission summary	Response summary	Recommended action
	other transport projects such as the potential east-west public transport corridors.	
<p>Housing - <i>District Plan</i> Action 18 – Suggests revising Council's Affordable Rental Housing policy (10% affordable housing requirement) for consistency with the <i>District Plan</i> which notes that this is subject to feasibility.</p>	<p>The principle in P16 to seek a minimum 10% affordable rental housing for all planning proposals for upzoning, urban renewal or greenfield development, with higher rates where financially feasible, is consistent with the Affordable Housing Policy endorsed by Council.</p> <p>Planning for urban renewal areas will involve place-based approaches e.g. master plans, place plans, structure plans, precinct plans, which will include feasibility studies to inform planning controls and address affordable housing requirements.</p>	No change
<p>Housing - Council was encouraged to work with DPIE in relation to State policies and the Local Housing Strategy.</p>	DPIE is identified as a partner for A15.1 to prepare the local housing strategy and A15.3 in relation to State policies.	No change
<p>Housing - Requests inclusion of data on secondary dwellings and boarding houses to illustrate demand.</p>	A new infographic (Figure 49*) was added to P15 to illustrate the number of dwellings per development type constructed since 2016.	Figure 49* added
<p>Managing growth and change - <i>District Plan</i> Action 17 - Suggests reframing the principles for managing growth and change to provide greater consistency with the <i>District Plan</i> (page 40).</p>	Strategic principles for managing growth and change have been amended to provide greater consistency with the <i>North District Plan</i> .	Managing growth and change section amended
<p>Measures - Suggests checking that measures from <i>Pulse</i> have been included.</p>	<p>The following additional measures have been added to <i>Towards 2040</i> to align with <i>Pulse</i>:</p> <ul style="list-style-type: none"> • job distribution by type • number of hot days (>35°C) • urban heat (P5). 	Measures section amended
<p>Planning framework - Suggests S9.1 directions and SEPPs should be identified in the line of sight.</p>	<p>Figure 2 (about <i>Towards 2040</i> section) is based on the 'line of sight' diagram contained in DPIE's 'LSPS guideline for Councils'.</p> <p>Figure 80* (implementation section) was amended to include S9.1 directions and SEPPs.</p> <p>The implementation section was amended include refer to applicable Ministerial Directions (s9.1 directions).</p>	Figure 80*, Implementation section amended
<p>Collaboration - Suggests changing terminology from 'advocate' and 'lobby' to 'work with'</p>	The terminology in A9.5*, A9.6* and A16.5 were amended from 'lobby and advocate' to 'work with', for a more collaborative approach to planning.	A9.5*, A9.6*, A16.5 amended

Submission summary	Response summary	Recommended action
	Note: a number of actions in P19 were amended to identify transport initiatives that Council will advocate for. This is in response to feedback from TfNSW.	
GSC Technical health check of final LSPS (4 February 2020)		
Principles for growth – <i>District Plan</i> Action 17 - suggests changing the principle ‘avoid residential uses in industrial precincts and business parks’ to the wording of the North District Plan ‘retain and manage’	Managing growth and change principle was changed for consistency with P28. This principle is founded on the <i>North District Plan</i> (planning priority N11).	Managing growth and change principle amended
Principles for growth – <i>District Plan</i> Action 17 - suggests simplifying the text to clarify that rezonings will likely be proposed to deliver a new LEP and implement the local housing strategy (including delivery of 6-10 year housing targets). Current wording suggests there is no opportunity for change.	Reference was removed to no changes to current planning controls. Text was amended to clarify that planning proposals that seek to deliver housing above that required and identified in the ‘local housing strategy’ will have challenges in demonstrating strategic merit. Reference to ‘housing target’ was changed to ‘implied dwelling requirement’ and implied dwelling requirement was added to the glossary. These changes acknowledge that changes to Council’s planning controls will be required to deliver the new LEP and implement the local housing strategy.	Managing growth and change section Glossary amended
Metropolitan Rural Area – noted the identification of certain land as ‘future MRA investigation area’ subject to the review of the <i>Region Plan</i> . Noted that the differences may be due to GIS mapping layers and live planning proposals during the finalisation of the <i>Region Plan</i> .	Noted.	No change
Metropolitan Rural Area – <i>District Plan</i> Action 69 - suggests strengthening commitment to engagement with Aboriginal community in relation to land at Oxford Falls and Belrose North. Suggests including reference to working with MLALC to better understand land constraints in the MRA (whilst it was noted this was already addressed in P13, it was suggested an additional reference to this is added to P4)	A4.7* was added to align with P13. The new action indicates Council will work with MLALC to better understand constraints as well as feasible and appropriate land use opportunities on land owned by MLALC. DPIE, MLALC and NSWALC were identified as partners for this new action.	A4.7* added
Resilience – A8.6 - climate change action plan partner ‘Cancer Institute NSW’ should be expanded to include DPIE, Resilient Sydney, Office of Emergency Management	A8.6 was amended to include additional partners (DPIE, Resilient Sydney, Office of Emergency Management).	A8.6 amended
Cemeteries – <i>District Plan</i> Action 3 - suggests A12.10* be amended to also include investigation of ‘innovative solutions’ to increase the density of cemeteries	A12.10* was amended to include reference to ‘innovative solutions’ in addition to investigating expansion of cemeteries.	A12.10* amended

Submission summary	Response summary	Recommended action
<p>Housing – <i>District Plan</i> Action 17 - suggests clarifying that the 'demand' for housing to 2036 of 11,747 dwellings is actually an 'implied dwelling requirement' based on demographic modelling (different from market demand)</p>	<p>P15 text was amended to clarify that the 11,747 dwelling 'demand' figure is an 'implied dwelling requirement'. A definition for 'implied dwelling requirement' was also added to the glossary.</p> <p>Note: 'Demand' is mentioned throughout <i>Towards 2040</i>. Therefore, adding an explanation to the text in P15 and a definition to the glossary is the most appropriate response and will maintain plain English.</p>	<p>P15 text, Glossary amended</p>
<p>Housing – <i>District Plan</i> Action 17 - suggests clarifying that the 'supply' of housing (Figure 48*) is actually 'feasible capacity' under current planning controls and likely supply from planned precincts. Also suggests adding further narrative on feasible housing capacity including clarifying the 6,400 new dwellings in areas already zoned for growth</p>	<p>The housing capacity outlined in <i>Towards 2040</i> is based on the preliminary findings from the local housing strategy, which includes high-level feasibility analysis. More detailed feasibility testing will be completed in the local housing strategy. P15 text was amended to clarify the local housing strategy will consider feasibility. Note: Map 17* already refers to 'feasible housing capacity under current controls'.</p> <p>P15 text was amended to clarify that the existing capacity under current planning controls (for 6,400 new dwellings) is 'feasible' capacity which is further broken down by location in Map 17* and by type in Figure 50*.</p>	<p>P15 text amended</p>
<p>Housing – suggests clarifying household size assumptions in the local housing strategy (e.g. expectation household size will stabilise)</p> <p>Housing – advised that housing targets are based on Sydney Water connections, with secondary dwellings acknowledged as contributing to housing supply</p> <p>Housing – notes that a 6-10 year housing target is to be confirmed in the local housing strategy</p> <p>Housing – suggests that the historical trend of housing demand be considered in the local housing strategy</p>	<p>These are matters that will be addressed in the local housing strategy.</p>	<p>No change</p>
<p>Housing – <i>District Plan</i> Action 17 - TfNSW suggests distribution of housing capacity around the B-Line bus stops</p>	<p>This is addressed in:</p> <ul style="list-style-type: none"> • P15 principle to 'locate new housing in strategic and local centres and within reasonable walking distance (800m) of high-frequency public transport'. This principle is flexible as it applies to high-frequency transport other than the B-Line (e.g. ferry). • P19 principle to 'respond to opportunities and implications arising from new transport infrastructure'. This principle applies to new infrastructure, such as the B-Line or other future transport projects, such as the Beaches Link Tunnel or east-west links. 	<p>No change</p>

Submission summary	Response summary	Recommended action
	<ul style="list-style-type: none"> Map 18* identifies that areas up to 1.5km from strategic and local centres with high-frequency public transport will be investigated for increased housing diversity. This includes a number of B-Line bus stops. <p><i>Towards 2040</i> identifies opportunities to investigate housing capacity around public transport, such as B-Line bus stops, through principles and maps which will guide the local housing strategy (A15.1) which will further investigate the distribution of housing.</p>	
<p>Housing – suggests that actions seeking exemptions to State policies (e.g. SEPPs) be reworded to continuing working with DPIE on the application of the relevant SEPPs by developing a local approach to the provision of seniors housing, boarding houses and medium density housing based on evidence in the LHS (Actions 4.4, 15.3, 28.2)</p>	<p>Actions 2.2, 4.4, 15.3, 16.5, 28.2 were amended to clarify that Council will work with DPIE on the application of SEPPs by developing appropriate approaches based on evidence in the local housing strategy. DPIE was added as a partner for A2.2 and A28.2.</p>	<p>A2.2, A4.4, A15.3, A16.5, A28.2 amended</p>
<p>Affordable housing – <i>District Plan</i> Action 18 - clarify that the 10% affordable housing requirement (and 15% Frenchs Forest target) is a Council initiative, which differs from the target identified in the <i>Region Plan</i></p>	<p>P16 text was amended to include reference to the <i>Region Plan</i> 5-10% affordable rental housing target, subject to viability. The text clarifies that the 10% affordable housing target (with higher rates where feasible) is a Council initiative from the endorsed Affordable Housing Policy.</p>	<p>P16 text amended</p>
<p>Affordable housing – <i>District Plan</i> Action 18 – suggests changing reference from ‘key workers’ to ‘low to very low income households’ inline with relevant State policies</p>	<p>A definition for affordable rental housing is provided in page 126 (i.e. very low income households, low income households or moderate income households). A16.2 aligns with Council’s Affordable Housing Policy. A16.2(b) refers to Council’s policy for prioritising allocation of affordable housing to eligible households. Prioritising allocation to key workers is within the legislative framework.</p>	<p>No change</p>
<p>Transport – <i>District Plan</i> Action 51 - suggests ensuring that reference to Dee Why – Chatswood connection relates to increased transport services (not B-Line or mass transit) as the project is in investigation stage</p>	<p>This matter was addressed in our previous response to GSC Phase 3 Preliminary Review feedback & TfNSW submission where a number of changes to terminology were made to better align with <i>Future Transport 2056</i> and to delineate TfNSW-led initiatives from initiatives that Council-led initiatives.</p> <p>See previous amendments to: P9, Map 12*, P19, Map 22*, A19.3, A19.4, A19.5, A19.6 A19.8.</p>	<p>No further change</p> <p>refer to changes to GSC Phase 3 - Preliminary Review feedback & TfNSW submission response</p>
<p>Transport – <i>District Plan</i> Action 51 – suggests that Council’s commits to work with TfNSW on the impact of Beaches Link on local communities</p>	<p>This matter was addressed in our previous response to GSC Phase 3 Preliminary Review feedback. The structure plan identifies a ‘Beaches Link Tunnel investigation area’, which was extended to address TfNSW’s submission. A19.7 indicates Council’s commitment to investigate</p>	<p>No further change</p>

Submission summary	Response summary	Recommended action
	opportunities in areas subject to change from the tunnel project. Furthermore, the local housing strategy (A15.1) will explore future housing opportunities, including if any opportunities exist from the Beaches Link Tunnel and other transport projects such as the potential east-west public transport corridors.	refer to changes to GSC Phase 3 - Preliminary Review feedback
Frenchs Forest – <i>District Plan</i> Action 30 - suggests removing reference to the 41m height limit as building heights still need to be determined	Reference to building height limit in Frenchs Forest was removed as the planning controls for the strategic centre have not been finalised.	P23 text amended
Brookvale – queried status of the draft Brookvale Structure Plan and strategic directions in relation to industrial lands	The draft Brookvale Structure Plan was prepared prior to the <i>North District Plan</i> . Council is committed to retain and manage all industrial lands in line with the <i>North District Plan</i> . P28 supports this position.	No change
Partners – <i>District Plan</i> Action 12 - replace RMS with TfNSW	References to 'RMS' were deleted and/or replaced with TfNSW.	Acronyms, Map 12* amended
Planning framework - suggests additional text be added referencing SEPPs and S9.1 Ministerial Directions	The simplified version of the strategic planning framework shown in Figure 2 (page 10) is based on DPIE's LSPS Guideline. Reference to SEPPs and S9.1 Ministerial Directions has been included in a more detailed diagram that was added in response to GSC Phase 3 Preliminary Review feedback (Figure 80*, page 193). It is also referenced in the implementation section (page 192). This is the most appropriate location for it to be referenced and fully explained within the broader policy framework. See previous amendments to implementation section and Figure 80*.	No further change refer to changes to GSC Phase 3 - Preliminary Review feedback
Strategies – suggests full description of strategies (e.g. MOVE Transport Strategy) for improved legibility	References to 'Move' Transport Strategy and 'Protect.Create.Live' Environment and Climate Change Strategy have been expanded for improved legibility.	A2.7, P7 text, P8 text, A7.5, A8.5, P19 text, P20 text, A20.1 amended
Green grid – verbal advice from the GSC, following the health check, raised concern regarding inconsistency with the <i>District Plan</i> in relation to P5 text which indicates Council does not support recreational access to Dee Why Lagoon (green grid project identified in <i>District Plan</i>).	P5 text was revised to clarify that any expansion or change in intensity to recreational access for Dee Why Lagoon will require further assessment and community consultation, particularly given its status as a wildlife refuge.	P5 text amended
Heritage – the Department of Premier and Cabinet (Heritage DPC)		
Aboriginal heritage and culture - Supportive of: <ul style="list-style-type: none"> Strong recognition of heritage and culture as a fundamental aspect of the identity of the city. Aboriginal and historic heritage initiatives. 	Noted.	No change

Submission summary	Response summary	Recommended action
<p>Tourism - Suggests considering the linkages between culture, heritage and tourism, and the opportunities culture and heritage bring to economic growth.</p>	<p>The text in P29 was amended to expand on Aboriginal culture-based tourism.</p> <p>It is noted that P29 identifies five tourism theme experiences, as outlined in Council's draft destination management plan (DMP). One of these themes is 'shared heritage' which recognises the role of heritage and culture in tourism and local economic growth. The DMP will inform new planning controls (A29.1).</p>	<p>P29 amended</p>
<p>Character - Suggests articulating heritage as it relates to the character of the city, including potentially identifying clusters of places and items which contribute to the significant character of the place.</p>	<p>A new principle was added to P17 to acknowledge the importance of heritage and culture in local character and place.</p>	<p>P17 amended</p>
<p>Education - Suggests maximising learning outcomes through the Coast walk and innovative story telling.</p>	<p>A14.5 includes delivering the coast walk and implementing the coast walk public art strategic plan, including heritage interpretation and artistic and cultural programs.</p>	<p>No change</p>
<p>Education - A18.3 which refers to educating the community and connecting to the Heritage Near Me program should be amended to remove reference to the Heritage Near Me program which no longer operates.</p>	<p>A18.3 was amended to remove reference to the Heritage Near Me program. The timing of the action was updated to ongoing.</p>	<p>A18.3 amended</p>
<p>Heritage - Suggests amending data on heritage items as follows:</p> <ul style="list-style-type: none"> • 14 State heritage register items (15 are listed in LSPS) • 4 Aboriginal Places • 1,060 recorded Aboriginal sites (440 identified Aboriginal heritage sites are listed in LSPS) 	<p>Text in P13 and P18 were amended to reflect updated data on heritage items.</p>	<p>P13, P18 amended</p>
<p>Northern Sydney Local Health District (NSLHD) Health Promotion</p>		
<p>Health and wellbeing/place planning/active travel - Commends the inclusion of:</p> <ul style="list-style-type: none"> • Health and wellbeing. • Four fast and frequent public transport corridors with safe and convenient walking and cycling paths, supporting active living by reducing car dependency. • Place-based planning. 	<p>Noted.</p>	<p>No change</p>

Submission summary	Response summary	Recommended action
<p>Primary industry/food production - Supportive of principles supporting primary industry, particularly food production, which is supported by avoiding urban intensification and subdivision in the MRA.</p> <p>Suggests mixed-use developments prioritise outlets which provide quality fresh fruit and vegetables.</p>	<p>P12 includes a principle supporting fresh food production. This principle was strengthened to include reference to healthy fresh food in shops.</p>	<p>P12 amended</p>
<p>Open space - Acknowledges the identified shortfall of land for sport and commends principles for more efficient use of open space and locating all high-density areas within 200m of open space.</p>	<p>Noted.</p>	<p>No change</p>
<p>Education - Supportive of access to world-class education including universities (P10). Notes low LGA participation rates in tertiary education.</p> <p>Suggests partnering with the university sector to bring a major campus and/or more tertiary education options to the Northern Beaches. This will increase vocational opportunities and improve equity and reduce traffic congestion caused by students commuting out of the area.</p>	<p>A principle in P10 was amended to include tertiary education opportunities (in addition to a university).</p> <p>A10.1 was amended to include investigation of opportunities and partnerships to bring a university and/or more tertiary education options to a strategic centre.</p>	<p>P10, A10.1 amended</p>
<p>Community facilities/health/wellbeing indicators - Supportive of P11 for community facilities and services that meet changing community needs and P12 for an inclusive, healthy, safe and socially connected community, including the actions for studies and further actions that will result from the studies.</p> <p>Notes the high rates of mental health-related hospitalisations and suicide in the LGA and agrees that creating opportunities for people to participate in community activities encourages social connections, trust, understanding and neighbourliness.</p> <p>Suggests including NSLHD Health Promotion as a partner for A12.7 to develop wellbeing indicators.</p>	<p>NSLHD was added as a partner for A12.6*.</p>	<p>A12.6* amended</p>
<p>Character - Supportive of P17 for centres and neighbourhoods designed to reflect local character and lifestyle.</p>	<p>Noted.</p>	<p>No change</p>
<p>Housing - Supportive of P15 requirements for housing including precinct level planning, proximity to public transport, provision of</p>	<p>P6 and P15 include a principle that will ensure new housing is located close to open space. This is also included as a measure.</p>	<p>Map 9*, Map 10* added</p>

Submission summary	Response summary	Recommended action
<p>open space and other infrastructure for the centre, increased housing diversity.</p> <p>Suggests ensuring all residential areas are within 10 minutes' walk of quality public green space as per the NSW Premier's Priority and all high-density residential areas are within 200m of quality public open space, with this being provided in the early stages of new developments.</p>	<p>New maps (Maps 9* and 10*) have been added to P6 identify areas where access to open space is limited. This will assist with planning for housing.</p>	
<p>Transport/active travel - Supportive of P19 for regional public transport and P20 for active travel. Commends A20.4 for new safe cycling routes.</p> <p>Notes that Beaches Link Tunnel will likely reduce traffic along Military Road and suggests that Council work with Mosman and North Sydney Councils to facilitate building a separated cycleway from the Northern Beaches through Mosman and North Sydney LGAs to City of Sydney.</p>	<p>A20.4 refers to new cycling routes, including the Greater Sydney Principal Bicycle Network. This action was amended to include the Sydney CBD as a destination for new separated cycleway routes. North District councils were added as a partner for this action.</p>	<p>A20.4 amended</p>
<p>Schools/active travel - Notes Council's Active to School initiative to encourage walking and cycling to school (A20.6). Suggests collaboration with existing and new schools to provide active transport routes and infrastructure which will encourage active transport.</p>	<p>Council is currently working with a number of schools and TfNSW on Active to School initiatives to deliver active transport routes and infrastructure (A20.6). This action was amended to include TfNSW as a partner.</p>	<p>A20.6 amended</p>
<p>Night time economy/health - Notes that Northern Beaches has a greater proportion of residents drinking alcohol at a high-risk level than the North District and NSW as a whole. Supports P30 (diverse night time economy) which is not solely predicated upon consumption of alcohol.</p> <p>Suggests supporting diverse late night attractions such as night markets, parks and public spaces with adequate lighting and access to public toilets</p>	<p>Council will prepare a night-time economy strategy (A30.1) that will respond to key priorities and actions identified in the Northern Beaches Community Safety Plan (A30.4), including those related to alcohol consumption in the LGA.</p> <p>Efforts to support diverse late night attractions such as night markets, parks and public spaces are supported by the amended principle in P30, which has been amended to clarify that locations will be broadened, not just activities.</p> <p>Public domain aspects including lighting and access to public toilets will be addressed in the public domain guidelines (A17.1), place plans, precinct plans and activation plans for areas including Manly, Mona Vale and Frenchs Forest Planned Precinct (A30.3).</p>	<p>P30 amended</p>

Submission summary	Response summary	Recommended action
NSW Rural Fire Service (NSW RFS)		
<p>Bush fire - Supportive of strategic planning principles that advocate identification of native bush land for conservation and rehabilitation, demarcation of suitable locations for future development based on environmental constraints analysis and provision of adequate infrastructure to support existing and future development.</p>	Noted.	No change
<p>Bush fire - Recommends that Council consider further studies on bush fire risk to development on bush fire prone land, that consider principles in Chapter 4 of <i>Planning for Bush Fire Protection 2019</i>.</p>	A8.1 was amended to outline proposed bushfire studies to inform the new LEP including completion of the Bush Fire Prone Land Map and plans to undertake a strategic bushfire risk assessment in accordance with <i>Planning for Bush Fire Protection 2019</i> .	A8.1 amended
<p>Bush fire - Notes that inappropriate development must be excluded in bush fire prone land where:</p> <ul style="list-style-type: none"> • The bush fire risk makes it inappropriate for a new development to occur (in some cases, even despite compliance with <i>Planning for Bush Fire Protection 2019</i>). • The development is likely to be difficult to evacuate during a bush fire due to its siting in the landscape, fire history and/or size and scale. • The development will adversely affect other bush fire protection strategies or place existing development at increased risk. • The development is within an area of high bush fire risk where density of existing development may cause evacuation issues for both existing and new occupants. • Environmental constraints to the site cannot be overcome. 	<p>Council has amended the principles within P8 to align with these principles.</p> <p>The following amendments were made to align with the <i>Planning for Bush Fire Protection 2019</i>:</p> <ul style="list-style-type: none"> • principle in P8 amended to include reference to avoiding inappropriate development in areas exposed to natural and urban hazards. • a principle to avoid developments in high risk areas that rely on performance-based solutions, are difficult to evacuate or would be occupied by at-risk members of the community (including schools, hospitals and nursing homes) was added to P8. • A8.1 was amended to identify that the new Northern Beaches Bushfire Prone Land Map and strategic bushfire risk assessment guide development in accordance with State government guidelines, including <i>Planning for Bushfire Protection 2019</i>. NSW RFS was added as a partner for this action. • A8.2 was amended to include reference to bushfire prone areas and the need to limit intensification of development for both risk minimisation and environmental protection. Reference to the environment study and housing strategy has been removed as this will be addressed in a number of other studies including those in A8.1. • NSW RFS and DPIE were added as partners for A8.3. 	P8, A8.1 amended
<p>Bush fire - Notes that the relevant bush fire protection measures applicable to different types of development need consideration at the strategic planning stage to ensure that future development can comply with PBP.</p>	Reference was made to the PBP in A8.1.	A8.1 amended

Submission summary	Response summary	Recommended action
Office of Sport		
<p>Open space - Suggests inclusion of Office of Sport as a partner for A1.4.</p>	<p>Office of Sport was added as a partner for A1.4.</p>	<p>A1.4 amended</p>
<p>Green grid - Suggests inclusion of Office of Sport as a partner for A1.9.</p> <p>Also suggests investigation of opportunities for non-motorised water sports launching, storage and utilisation.</p>	<p>Office of Sport was added as a partner for A1.9. The action was also amended to include reference to opportunities for non-motorised water sports launching, storage and utilisation.</p>	<p>A1.9 amended</p>
<p>Recreation - Suggests inclusion of Office of Sport as a partner for A4.5.</p> <p>Also suggests referencing Outdoor NSW.</p>	<p>Office of Sport was added as a partner for A4.5. The action was also amended to acknowledge that Council intends to work with Outdoors NSW on the open space and recreation strategy, to identify opportunities for recreation.</p>	<p>A4.5 amended</p>
<p>Open space/recreation - Suggests inclusion of DPIE and Office of Sport as a partners for A6.1.</p>	<p>Office of Sport and DPIE were added as partners for A6.1.</p>	<p>A6.1 amended</p>
<p>Sports fields - Suggests inclusion of Office of Sport as a partner for A6.3.</p> <p>Also suggests reference to innovative sports facility inclusion in new development.</p>	<p>The Office of Sport was added as a partner for A6.3.</p> <p>A6.2 was amended to clarify the requirement for LEP and DCP controls to improve provision of open space and recreation (for example, innovative sports facilities inclusion in new developments).</p>	<p>A6.2, A6.3 amended</p>
<p>Sports fields - Suggests inclusion of Office of Sport as a partner for A6.5.</p> <p>Also suggests including reference to Frenchs Forest Planned Precinct.</p>	<p>This action is based on Council's Sportsground Strategy. The strategy was completed in 2017 and therefore a precinct-specific open space study will guide the planning for Frenchs Forest Planned Precinct.</p>	<p>No change</p>
<p>Collaboration/open space/recreation/ shared use/funding/Frenchs Forest - Suggests inclusion of Office of Sport as a partner for A10.2, A11.1, A11.3, A11.5, A11.7, A11.8, A12.2, A12.4, and A12.5.</p>	<p>Office of Sport was added as a partner for A10.2, A11.1, A11.3, A11.5, A11.7, A11.8, A12.2, A12.3*, A12.4*.</p>	<p>A10.2, A11.1, A11.3, A11.5, A11.7, A11.8, A12.2, A12.3*, A12.4* amended</p>
<p>Place planning - Suggests inclusion of Office of Sport as a partner for A12.1.</p> <p>Also suggests reference to active communities.</p>	<p>Reference to active communities was added to A12.1. The partner for this action is 'all' which includes Office of Sport.</p>	<p>A12.1 amended</p>

Submission summary	Response summary	Recommended action
Frenchs Forest - Suggests reference to sports facilities (A12.2).	Reference to sports facilities was not added as this action refers to the Green Star liveability criteria which does not include sports facilities.	No change
Recreation - Suggests reference to green, active recreation and/or sports facilities on rooftops (A12.5)	A12.4* amended to include reference to green, active recreation and/or sports facilities on rooftops.	A12.4* amended
State Library (SL)		
Libraries - Identifies the need for larger libraries as the population grows, and communities use libraries for more services. Suggests the State Library can assist in the assessment of library space needs.	P9, Map 12* was amended to show Mona Vale and Glen St libraries and include libraries as a collaboration project with SL and the Australian Library Information Association (ALIA) listed as partners (under arts, heritage and innovation). Assessment of library space needs is addressed below.	Map 12* amended
Libraries - Notes the important role of libraries in: <ul style="list-style-type: none"> • Education around healthy lifestyles. • Places for social inclusion. • Mechanism for connected communities through library programs, such as home library services. • Arts and creative opportunities through access to space, resources, technology. • Maker spaces that support innovation and skills development. • Temporary workspaces that support telecommuting or entrepreneurs or small business. 	A new action (A12.9*) was added to acknowledge the important role of libraries for inclusive, health, safe and socially connected communities. ALIA and SL were added as partners for this action.	A12.9* added
Libraries - Identifies that the use of library spaces is changing in response to community needs. Commends council on remodelling of Dee Why and Mona Vale libraries and the new Glen Street library. Suggests <i>Towards 2040</i> looks at aligning appropriately sized libraries with relevant strategic and local centres with State Library assistance.	A11.1 was amended to include reference to the library strategy that Council is preparing. Council will work with SL and ALIA to develop the library strategy and identify future library space and usage requirements. SL and ALIA were added as partners for this action.	A11.1 amended
Libraries/education/partnerships - Identifies the important role of public library space to be used by students at all levels, including those accessing distance education. Suggests library spaces support individual and group study. Also suggests that partnerships, including co-location and service level agreements may enhance the likelihood of tertiary providers looking to the Northern Beaches for opportunities.	An existing principle in P10 was expanded to address the availability of local education opportunities and the use of libraries to support individual and group study. An existing principle in P11 was amended to address partnership opportunities for education and community uses. An existing principle in P11 addresses co-location opportunities of community services and facilities in community hubs in strategic centres.	A11.5 amended

Submission summary	Response summary	Recommended action
	A11.5 was amended to include SL and independent schools as partners (for opportunities for joint and shared use and public-private partnerships).	
Libraries - Supports Council's current work bringing together local studies collections and digitisation standards. Notes Council's role as a key provider of community heritage information and resources.	This will be addressed in Council's library strategy. A11.1 was amended to include reference to the library strategy that Council is preparing.	A11.1 amended
Sydney Water		
Green grid - Supports Green Grid projects and suggests collaborating with Sydney Water to deliver these outcomes.	Sydney Water was added as a partner to A1.4, A1.9 and A5.4* and added as a collaboration partner in P9, Map 12*, which includes the Greater Sydney Green Grid.	A1.4, A1.9, A5.4*, P9, Map 12* amended
Integrated water cycle management - Commends Council for investigating integrated water cycle management and suggests that working with Sydney Water for water sensitive urban design and water conservation can assist in delivering these outcomes.	Sydney Water was added as a partner for A1.3.	A1.3 amended
Coastal management - Suggest that the recommendations from the long-term coastal management programs (identified in A1.6) be incorporated into future LEP and DCP amendments.	A1.3 was amended to ensure that coastal management programs (identified in A1.6) are addressed in new LEP and DCP controls.	A1.3 amended
Water quality - Suggests that water quality outcomes could be further enhanced by monitoring and analysing water quality trends to inform catchment management activities, including creating standards and/ or regulations for development and recreational uses within catchment zones.	A1.3 involves new LEP and DCP controls that address the above studies, which include stormwater quality targets that implements the risk-based framework. Monitoring and reporting needs will be identified in the stormwater quality management plan (A1.1).	No change
Open space/recreation - Suggests that Sydney Water contribute to the open space and recreation strategy to integrate active transport routes within the green grid and future coastal walks, to strengthen management of the grid and tree canopy.	Sydney Water was added as a partner to A6.1.	A6.1 amended
Efficiency - Supports establishment of water efficiency targets to reduce consumption. Suggests further consideration of dual plumbing to allow for future connections to recycled water when available.	A new figure (Figure 36*) was added to P7 and includes drinking water commitments from <i>Protect. Create. Live.</i> A1.3 was amended to ensure that integrated water cycle management identified in Figure 25 is considered in the new LEP and DCP controls. This will include water sensitive urban design and stormwater reuse, such as dual plumbing.	A1.3 amended Figure 36* added

Submission summary	Response summary	Recommended action
Food waste - Sydney Water is accepting pre-consumer food waste at some wastewater treatment plans for co-digestion and can share its learnings with Council.	Noted.	No change
Infrastructure - Requests that Council inform Sydney Water of any potential changes to projected population, dwellings and employment to assist with planning for water needs and water infrastructure for the LGA.	This is not a matter for consideration for the LSPS.	No change
Infrastructure - Recommends appropriate land use zoning for water related operational infrastructure in the LEP.	A9.2 includes development of new LEP and DCP controls that safeguard infrastructure needs, including SP2 infrastructure.	No change
Efficiency - Sydney Water offers assistance with input to improve re-use and resource recovery (e.g. non-potable recycled water and stormwater harvesting) as well as education to reduce water consumption and increase re-use.	A7.5 involves development of action plans as part of implementation of <i>Protect. Create. Live</i> . This will detail initiatives aimed at achieving the commitments in the strategy, which include reduced water consumption. Sydney Water was added as a partner for A1.11* (new action identifying projects with Sydney Water).	A1.11* added
Transport for NSW (TfNSW)		
Transport accessibility planning - Suggests incorporating transport accessibility planning (including travel demand management, sustainable transport and sustainable land use operating practices) into Council strategies.	This is addressed in P19 and P20, including A19.1 which identifies the need to prepare a transport study to support the new LEP and an LGA-wide land use infrastructure implementation plan. P7, Figure 39* was amended to identify demand management initiatives as an LGA wide opportunity to improve efficiency. The Glossary was also amended to include a definition for demand management (as per <i>Future Transport 2056</i>).	Figure 39*, Glossary amended
Beaches Link Tunnel - Notes that the Beaches Link investigation area extends along Wakehurst Parkway to Warringah Road.	The Beaches Link Tunnel investigation area is indicative only. However, the structure plan (Map 1) and Figure 18 were amended to extend the investigation area along Wakehurst Parkway to Warringah Road (Frenchs Forest) to align with NSW Government maps for the tunnel link.	Map 1, Figure 18 amended
Place planning - Notes that TfNSW welcomes early discussion with Council in relation to movement and place in master/place planning.	This is addressed in A21.1 which includes the implementation of TfNSW's movement and place framework - with TfNSW listed as a partner. A12.1 also identifies that Council will engage early with State agencies in precinct and place plans. All agencies are listed as a partner for this action.	No change

Submission summary	Response summary	Recommended action
<p>Active travel - Suggests the following be added as a principle for managing growth and change:</p> <ul style="list-style-type: none"> • Provide safe, high quality walking and cycling links that cater for and encourage short trips to local centres, public transport services, schools, local open space and the Green Grid, and other trip attractors 	<p>This is addressed in P20 which identifies that Council's walking plan and bike plan support walking and cycling for shorter trips and for the start and finish of trips on other modes of transport. P20 also includes:</p> <ul style="list-style-type: none"> • principles to prioritise walking infrastructure and safe cycling routes connecting to destinations such as schools • A20.4 to investigate new safe cycling routes separated from traffic connecting to destinations. <p>Initiatives supporting active travel and contributing to healthy, safe and active communities are embedded throughout <i>Towards 2040</i> (P1-2, P5-7, P9-12, P15-17, and P19-P27).</p>	<p>No change</p>
<p>Tree canopy - Supportive of increasing tree canopy to provide shade along key walking and cycling routes and reducing UHI. Trees, awnings and landscape features to be located to not obstruct sight lines to traffic and setback to allow for bus/heavy vehicle overhang.</p>	<p>Noted.</p>	<p>No change</p>
<p>Transport demand management - Recommends adding the following action to align with the <i>District Plan</i>:</p> <ul style="list-style-type: none"> • Transport demand management initiatives including working from home, improved walking and cycling, improved access to car sharing, carpooling and on-demand transport will also be considered in helping to achieve net-zero greenhouse gas emissions. 	<p>P7, Figure 39* was amended to identify demand management initiatives as an LGA wide opportunity to improve efficiency. The Glossary was also amended to include a definition for demand management (as per <i>Future Transport 2056</i>).</p>	<p>Figure 39*, Glossary amended</p>
<p>Education/transport demand management - Notes opportunity for Council to further build on its strong community links and to influence the provision and use of travel demand management, sustainable transport and sustainable land use operating practices through the statutory planning process and voluntary agreement through community outreach programs and in collaboration with key stakeholders.</p>	<p>This is addressed in P20 which includes a number of principles and actions for improved sustainability in the local transport network.</p> <p>P7 also identifies a number of opportunities to improve efficiency, including precinct-scale efficiencies, compact settlements, smart technology and improved buildings standards (e.g. electric vehicle charging). These opportunities are further addressed in A7.2 and A7.3. P7, Figure 39* was amended to identify demand management initiatives as an LGA wide opportunity to improve efficiency. The Glossary was also amended to include a definition for demand management (as per <i>Future Transport 2056</i>).</p>	<p>Figure 39*, Glossary amended</p>

Submission summary	Response summary	Recommended action
<p>Infrastructure - Notes that an LGA-wide land use and infrastructure implementation plan and that TfNSW will work with Council on this plan.</p>	<p>TfNSW was added as a partner for A9.1</p>	<p>A9.1 amended</p>
<p>Travel behaviour change - Suggests adding the following action to align with the <i>Region Plan</i> and the <i>District Plan</i>:</p> <ul style="list-style-type: none"> We will continue to work with TfNSW to support and implement travel behaviour change programs to help manage demand on the transport network, including by requiring new developments and businesses operating in key precincts to develop and implement travel plans to encourage the use of sustainable transport choices. 	<p>A20.2 refers to development of new LEP and DCP controls that support sustainable local transport networks. The action was amended to change 'workplace travel plans' to 'travel behaviour change programs that encourage the use of sustainable transport choices including requirements for travel plans'.</p>	<p>A20.2 amended</p>
<p>Consultation - Notes that TfNSW welcomes early consultation when considering large traffic generating proposals.</p>	<p>Noted.</p>	<p>No change</p>
<p>Active travel - Recommends that the proposed Principal Bicycle Network be included in Map 9.</p>	<p>P20, Map 24* was amended to refer to the Greater Sydney Principal Bicycle Network from <i>Future Transport 2056</i>.</p>	<p>Map 24* amended</p>
<p>Active travel - Recommends that the following principles and actions be included in P9:</p> <ul style="list-style-type: none"> Support walking or cycling to be the most convenient option for short, everyday trips up to 2km. Provide safe, high quality walking and cycling links that cater for and encourage short trips to local centres, public transport services, schools, local open space and the Green Grid, and other trip attractors. 	<p>This is addressed in P20 which identifies that Council's walking plan and bike plan support walking and cycling for shorter trips and for the start and finish of trips on other modes of transport. P20 also includes:</p> <ul style="list-style-type: none"> principles to prioritise walking infrastructure and safe cycling routes connecting to destinations such as schools A20.4 to investigate new safe cycling routes separated from traffic connecting to destinations. 	<p>No change</p>
<p>Collaboration - Notes that TfNSW will work collaboratively with Council to develop/review any traffic and transport investigations that will be required to identify the infrastructure that will be required to support the population increase.</p>	<p>TfNSW was added as a partner for A9.2.</p>	<p>A9.2 amended</p>
<p>Movement and Place framework - Suggests adding the following action:</p> <ul style="list-style-type: none"> Apply the principles of the Movement and Place framework by catering for and encouraging the role of walking and cycling in local movement networks and places. 	<p>This is addressed in A21.1 which includes implementation of TfNSW's movement and place framework and supporting principles in P20 and P21.</p>	<p>No change</p>
<p>Measures - Suggests that Council incorporate the indicators for 'walkable places' used in the <i>Pulse of Greater Sydney</i> including:</p>	<p>This is addressed in the measures which include measuring public transport and active travel patronage along with access to open space.</p>	<p>No change</p>

Submission summary	Response summary	Recommended action
<ul style="list-style-type: none"> Trips by walking (% of all trips). Trips to work by walking and cycling (% of trips to work). Access to open space (% of population within 400m walk of local open space). 		
<p>Frenchs Forest - Notes that the proposed level of development in the Frenchs Forest area would require significant changes to transport infrastructure and collaboration with TfNSW to assess longer-term public transport options to support Stages 2 and 3 of the precinct plan in accordance with NSW Government commitments.</p>	<p>P15 and P23 were amended to identify that future stages of development at Frenchs Forest, beyond Phase One, will depend on longer-term transport options such as the Beaches Link Tunnel and BRT from Brookvale-Dee Why to Chatswood.</p>	<p>P15, P23 amended</p>
<p>Parking - Suggests Council amend text to the following:</p> <ul style="list-style-type: none"> We will continue working with the NSW Government to deliver an integrated transport and land use planning approach in the Northern Beaches and consider reduced car parking maximum rates within Centres with good transport connections so that residents have the option to live without a car. 	<p>This is addressed in P7 and P20.</p>	<p>No change</p>
<p>Move Transport Strategy - Seeks clarification of how Council aims to reach the nominated target in relation to increasing walking, cycling and public transport trips in the area.</p>	<p>These targets are from Council's endorsed <i>MOVE</i> Transport Strategy 2038. They will be addressed through action plans that sit under that strategy, which are referred to in actions throughout <i>Towards 2040</i>.</p>	<p>No change</p>
<p>Future Transport 2056 - Suggests that Council note in P19 that TfNSW is working towards implementing the <i>Future Transport 2056</i> plan which identifies Barrenjoey Road north of Mona Vale as a centre serving corridor and Mona Vale to the city as a city shaping corridor.</p>	<p>P19, Map 22* was amended to show <i>Future Transport 2056</i> city serving and city shaping networks.</p>	<p>Map 22* amended</p>
<p>Future Transport 2056 - Suggests that regional public transport priorities listed in P19 be clearly identified as Council initiatives as some are not included in <i>Future Transport 2056</i>.</p>	<p>Text in P19 was amended to clarify that the regional transport initiatives listed are founded on a local vision, with terminology adjusted to better align with <i>Future Transport 2056</i>.</p> <p>P19, Map 22* was amended to identify transport initiatives (city-serving and city-shaping corridors) identified in <i>Future Transport 2056</i>.</p> <p>A19.3, A19.4, A19.5, A19.6, A19.8 were amended to identify the elements that are consistent with <i>Future Transport 2056</i> and initiatives that Council will advocate for to deliver the local vision.</p>	<p>P19, Map 22*, A19.3, 19.4, 19.5, 19.6, 19.8 amended</p>

Submission summary	Response summary	Recommended action
<p>Beaches Link Tunnel - Recommends that the Beaches Link Tunnel description in P19 be revised. Beaches Link Tunnel will provide connectivity to and from the Northern Beaches LGA at both Wakehurst Parkway and Burnt Bridge Creek Deviation and that public transport via both connections is being considered by government.</p>	<p>Text in P19 relating the Beaches Link Tunnel was revised.</p>	<p>P19 amended</p>
<p>Beaches Link Tunnel - Recommends that Council note that the Government has not confirmed or committed to the type of public transport services provided in the Beaches Link Tunnel.</p>	<p>Noted. Council's endorsed position is to support the Beaches Link Tunnel, subject to public transport.</p>	<p>No change</p>
<p>BRT/Future Transport 2056 - Notes that Brookvale-Dee Why to Frenchs Forest and Chatswood, and Mona Vale to Macquarie Park are not identified city serving corridors in <i>Future Transport 2056</i> and have not been identified as BRT routes. Recommends that Council clarify that the BRT is a Council-led initiative.</p>	<p>Actions A19.3 and A19.5 have been amended to align the wording of the actions with <i>Future Transport 2056</i> and identify that investigation of BRT is a matter that Council will advocate for. It is noted that A19.10 identifies the need for these east-west links to be included in the Greater Sydney city-serving network.</p>	<p>A19.3, A19.5 amended</p>
<p>Accessibility planning - Notes opportunity to promote the use of accessibility planning when planning access to existing and new land-uses across the LGA and in new growth areas. Recommends early engagement with transport planners for new developments/changes to land uses.</p>	<p>This is addressed in A20.1 which includes the preparation of a number of action plans to implement <i>MOVE</i> Transport Strategy 2038 along with pedestrian access and mobility plans.</p>	<p>No change</p>
<p>Freight and servicing - Suggests identification of the relationship between freight movements and place outcomes, specifically the link between planning, efficient management of freight and servicing, and securing good place outcomes for the other.</p>	<p>New text was added to P21 to describe the relationship between freight management and place outcomes.</p>	<p>P21 amended</p>
<p>Frenchs Forest - Notes that the strategy for Frenchs Forest does not adequately address a number of key issues:</p> <ul style="list-style-type: none"> • Any development beyond Stage 1, relocation of the school, opportunities for a university and boosting the Business Park require detailed traffic and transport assessment to determine additional major road/transport improvements are required. • Clarification of State and local government responsibilities. • Need for a holistic approach to the area. 	<p>P15 and P23 were amended to identify that future stages of development at Frenchs Forest, beyond Phase One, will depend on longer-term transport options such as the Beaches Link Tunnel and BRT from Brookvale-Dee Why to Chatswood.</p> <p>A23.7 was amended to clarify that Council will undertake further transport and traffic assessment as required to facilitate future development beyond Phase One.</p>	<p>P15, Map 18*, P23, A23.7 amended</p>
<p>Brookvale - Notes that TfNSW will work with Council on the future of Brookvale bus depot, particularly on how it can continue to support future transport requirements in the LGA while also achieving Council's vision and supporting its role as a strategic centre.</p>	<p>A new action (A24.6*) was added to work with TfNSW on the future of the Brookvale bus depot. TfNSW was added as a partner for this action and the timing is ongoing.</p>	<p>A24.6* added</p>

Submission summary	Response summary	Recommended action
<p>Freight and serving - Notes that Council planning around centres needs to address common user and secure storage facilities in residential developments to reduce delivery vehicle operations and kerb-side space for freight activities.</p>	<p>A21.2 was amended to include 'common user and secure storage facilities' and A21.3 was amended to include 'kerbside space for freight activities'.</p>	<p>A21.2, A21.3 amended</p>
<p>Movement and Place framework - Notes that Council could consider a movement and place approach to achieving both the transport and land use (place) aspects of <i>Towards 2040</i>. This will highlight any key conflicts, trade-offs, decisions or opportunities for achieving the vision. TfNSW will work with Council on implementing the Movement and Place framework.</p>	<p>This is addressed in A21.1 which includes implementation of TfNSW's movement and place framework.</p>	<p>No change</p>
<p>Travel plans - Notes that Council has an opportunity to use the statutory planning process to influence the provision of appropriate transport infrastructure to meet the needs of future land use developments e.g. Travel Plans to reduce reliance on private car ownership.</p>	<p>A20.2 was amended to include 'travel behaviour change programs that encourage the use of sustainable transport choices including requirements for travel plans'.</p>	<p>A20.2 amended</p>
<p>Travel plans - Recommends that Council work in close collaboration with new and existing trip generators re Travel plans. This may be achieved through the statutory planning process and through voluntary agreements with land use owners/occupants.</p>	<p>A20.2 was amended to include 'travel behaviour change programs that encourage the use of sustainable transport choices including requirements for travel plans'.</p>	<p>A20.2 amended</p>
<p>Collaboration - Notes the significant opportunity to work collaboratively with surrounding LGAs to develop a consistent approach to travel demand management, sustainable transport and sustainable land use practices through the statutory planning process and through voluntary agreement and to share insights and resources.</p>	<p>Noted.</p>	<p>No change</p>
<p>Transit orientated development - Suggests the following point be included in <i>Towards 2040</i>:</p> <ul style="list-style-type: none"> Urban form that supports and encourages walking and cycling and limits the need for motorised travel and long trips. Ideally, strategic and local centre expansion should be achieved in as compact fashion as possible which are walkable, mixed-use centres that allow future population to access a range of jobs, shops, social and civic services, entertainment and public transport nodes, within walking distance. This limits travel demand and contain trips. This limits the need for future populations to use major regional transport networks for short trips. 	<p>A number of principles in P15 and throughout <i>Towards 2040</i> identify the importance of new development being located in areas that supports walking and cycling.</p> <p>P15 text was amended to include identify 'urban form that supports and encourages walking and cycling' as a consideration for planning for future housing demand.</p>	<p>P15 amended</p>

Submission summary	Response summary	Recommended action
Road safety - Notes that TfNSW will work with Council on implementing the safe systems approach in the Road Safety Plan 2021.	Noted.	No change
Freight and logistics - Suggests that consideration be given to facilitating freight and logistics activities e.g. dedicated land and shared spaces which are particularly important in medium and high density developments.	A21.3 was amended to include 'shared spaces'	A21.3 amended
Infrastructure - Suggests that the LEP review process consider how TfNSW-owned land could be utilised to support placemaking outcomes, enhance transport outcomes and meet local housing needs.	TfNSW was added as a partner in A9.2.	A9.2 amended
Infrastructure/funding - Suggests that provision of sustainable transport infrastructure to increase the use of sustainable modes including autonomous vehicles be considered in development contributions, planning agreements and place-based plans.	A9.5* was amended to clarify that Council supports the increase of the range of essential infrastructure applicable under Section 7.11 of the EP&A Act, including sustainable infrastructure.	A9.5* amended
Efficiency - Suggests that a policy around technology requirements along with appropriate infrastructure, be incorporated into planned precincts, strategic and local centres, and growth areas, to reduce the need to travel and to improve access to sustainable transport solutions.	This is addressed in P7 and A7.2 which identify smart technology and infrastructure as an opportunity for improved efficiency.	No change
Schools/active travel - Suggests that <i>Towards 2040</i> aim to increase rates of walking and cycling to schools by students within walking and cycling distance by catering for and prioritising access by these modes.	This is addressed in P20 which includes: <ul style="list-style-type: none"> • principles to prioritise walking infrastructure and safe cycling routes connecting to destinations such as schools • A20.4 to investigate new safe cycling routes separated from traffic connecting to destinations such as schools • A20.6 increase uptake of schools in the Northern Beaches Active to School initiative to encourage walking and cycling to school. 	No change
Active travel - Suggests that the text be changed from 'including making it easier to walk and cycle' to 'providing safe, high quality walking and cycling links'	This is addressed in P20 which identifies that Council's walking plan and bike plan support walking and cycling for shorter trips and for the start and finish of trips on other modes of transport. P20 also includes: <ul style="list-style-type: none"> • principles to prioritise walking infrastructure and safe cycling routes connecting to destinations such as schools • A20.4 to investigate new safe cycling routes separated from traffic connecting to destinations. 	No change

Submission summary	Response summary	Recommended action
<p>Sydney motorway network - Suggests that the Beaches Link Tunnel is already connected to the Sydney road network and that P21 be amended to reflect that the Beaches Link Tunnel will be an improved connection or that it connects to the Motorway network for the first time.</p>	<p>P21 was amended to clarify that the Beaches Link Tunnel will connect to the Sydney motorway network for the first time, not the road network.</p>	<p>P21 amended</p>
<p>Active travel - Suggests that A17.3 be changed to reflect the text in relation to activating public space:</p> <ul style="list-style-type: none"> Prepare and implement activation plans that support walking and cycling to be the most convenient option for short everyday trips up to 2km and establish partnerships with businesses and the community, starting with Seaforth, Newport and Forestville" 	<p>This is addressed in the principles in P17 as well as P20 which identifies that Council's walking plan and bike plan support walking and cycling for shorter trips and for the start and finish of trips on other modes of transport.</p>	<p>No change</p>
<p>Transport projects - Recommends that A23.7, A24.5, A25.6, A26.3, A27.3, A29.4, A30.6 be reworded to state the following:</p> <ul style="list-style-type: none"> Facilitate the delivery of transport projects identified in P19. 	<p>A23.7, A24.5, A25.6, A26.3, A27.3, A29.4, and A30.6 amended.</p>	<p>A23.7, A24.5, A25.6, A26.3, A27.3, A29.4, A30.6 amended</p>
<p>Water NSW</p>		
<p>Infrastructure - Water NSW does not own or manage any land in the Northern Beaches LGA and therefore has no comment.</p>	<p>Noted.</p>	<p>No change</p>

**Note: figure/action numbers refer to the latest version of Towards 2040 (February 2020) and differ from the exhibited version (September 2019) which the submissions are based on. This may result in some discrepancy between references in submission summaries and Council's response.*